

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

APR - 6 2004

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In re)
)
 NPI-OMNIPOINT WIRELESS, LLC)
)
 Petition for Waiver of Deadlines)
 In 47 C.F.R. §§54.307(c), 54.802(a))
 and 54.903)

CC Docket No. 96-45

**PETITION OF NPI-OMNIPOINT WIRELESS, LLC
 FOR WAIVER OF DEADLINES
 IN 47 C.F.R. §§54.307(c), 54.802(a) and 54.903**

NPI-Omnipoint Wireless, LLC ("NPI"), by its attorneys and pursuant to Sections 1.3 and 1.925 of the Commission's rules,¹ hereby requests a waiver of the deadlines set forth in Sections 54.307(c), 54.802(a) and 54.903 of the Commission's Rules relating to the submission of quarterly line count information in connection with the distribution of support under the Federal Universal Service Fund so that NPI may receive support in the first quarter of 2004.² In support of this request, the following is respectfully shown:

I. BACKGROUND

NPI is a Very Small Business, as that term is defined by the FCC. Through its wholly-owned license-holding subsidiary NOW Licenses, LLC ("NOW"), NPI provides personal communications service ("PCS") in several markets within the State of Michigan, which cover predominantly rural areas. On March 3, 2003, NPI submitted an

¹ See 47 C.F.R. §1.3; 47 C.F.R. §1.925.

² There is no filing fee associated with this request. See 47 C.F.R. §1.1105.

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application to the Michigan Public Service Commission (the "MPSC") requesting designation as an ETC to receive high cost support from the Federal Universal Service Fund with respect to its subsidiary NOW's authorized service area within the State. On August 26, 2003, the MPSC issued an Order designating NPI as an ETC.

In anticipation of its ETC designation, and based upon verbal advice from the staff of the Universal Service Administrative Company ("USAC"), NPI submitted to the FCC and USAC its self-certifications regarding its use of Interstate Access Support ("IAS") and Interstate Common Line Support and Long Term Support ("ICLS") funds on June 27, 2003, pursuant to Sections 54.809 and 54.904 of the Commission's Rules.³ The MPSC submitted the requisite certification prior to October 1, 2003 to entitle NPI to High Cost support. NPI also submitted to USAC the line count information required by Sections 54.307(c), 54.802(a) and 54.903⁴ of the FCC's rules in order to receive Universal Service support beginning in the fourth quarter of 2003. USAC is completing its calculation of NPI's support for the fourth quarter of 2003, and has advised NPI that it should receive payment some time in April.

Subsequent to NPI's initial filings, and due to a misunderstanding of information it received from USAC, NPI did not file the line count information required by Sections 54.307(c), 54.802(a), and 54.903 of the rules to be filed by September 30, 2003. Consequently, absent a waiver of those rules, NPI will be denied Universal Service

³ 47 C.F.R. §§ 54.809, 54.904.

⁴ 47 C.F.R. §§ 54.307(c), 54.802(a), 54.903.

support during the first quarter of 2004. NPI respectfully submits that this result is contrary to the public interest, and that good cause exists to grant the requested waiver.

II. ELIGIBILITY FOR UNIVERSAL SERVICE SUPPORT FUNDS

Pursuant to Section 214(e) of the Communications Act of 1934, as amended (the "Act"), NPI became eligible to begin receiving Universal Service support on August 26, 2003, the date that the MPSC granted ETC status to the company.⁵ However, several FCC rules establish deadlines for the submission of certifications and line count information that constitute prerequisites to an ETC's receipt of Universal Service support funds. Specifically, Section 54.314(d)(1) requires that an annual certification be submitted by the state that makes the ETC designation by October 1, 2003 in order for the ETC to commence receiving high-cost support funds in the first quarter of 2004.⁶ Sections 54.809 and 54.904 require that certifications regarding an ETC's use of IAS and ICLS funds be filed when the ETC submits its first line count reports for support from those funds. Sections 54.307(c), 54.802(a) and 54.903 require that quarterly line count information be submitted in order for the ETC to receive High Cost, IAS and ICLS support. NPI satisfied each of these filing obligations, such that it was eligible to receive, and did receive, Universal Service support in the first full quarter following its designation as an ETC – the fourth quarter of 2003.

As a result of a misunderstanding of the information it had received from USAC staff, NPI did not understand that it was required to submit quarterly line count

⁵ 47 U.S.C. §214(e).

⁶ 47 C.F.R. §54.314(d)(1).

information in September 2003 in order to continue to receive High Cost, IAS and ICLS funds beyond the fourth quarter of 2003, and NPI did not submit those filings at that time. NPI incorrectly believed that, since its annual certifications had been filed, that no further information was required during that initial year period. NPI subsequently became aware of the obligation to make quarterly line count filings, and timely submitted its High Cost, IAS and ICLS line counts in both December 2003 and March 2004. For the following reasons, NPI respectfully submits that a waiver of Sections 54.307, 54.802(a) and 54.903 of the Commission's Rules is warranted with respect to the September, 2003 filing deadlines⁷

**III. WAIVER OF SECTIONS 54.307(c), 54.802(a)
AND 54.903 OF THE COMMISSION'S RULES IS WARRANTED AND
CONSISTENT WITH THE PUBLIC INTEREST**

Section 1.3 of the Commission's rules⁸ provides the Commission with discretion to waive application of any of its rules upon a showing of good cause. In addition, Section 1.925(b)(3) provides for waiver where it is shown that:

- (i) The underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or
- (ii) In view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.⁹

⁷ NPI has now submitted to USAC the line count information required to be filed in September, 2003. A copy of that line count submission is provided at Attachment A.

⁸ 47 C.F.R. § 1.3.

⁹ See 47 C.F.R. §1.925(b)(3).

NPI respectfully submits that good cause exists to warrant a waiver of sections 54.307(c), 54.802(a) and 54.903 of the Commission's Rules.

The purpose of the deadlines for submitting line count information to USAC to receive support from the Universal Service fund is to provide a mechanism for the orderly calculation of the support to which ETCs are eligible for a particular quarter in the future and to avoid the situation of an ETC submitting such information long after USAC has made all distributions for the relevant quarter. The purpose of the rules would not be frustrated by a grant of the waiver requested herein. The line counts that NPI should have submitted in September, 2003 would have been used to calculate NPI's first quarter 2004 support. NPI has been advised by USAC that it is still able to use NPI's September line count data to calculate the amount of support to which NPI is entitled in the first quarter of 2004, and to make such distribution. Thus, granting a waiver to permit the late-filed September line counts to be used as the basis for calculation and distribution of support to NPI would not frustrate the underlying purpose of the rule to foster the efficient administration of the Universal Service program

Furthermore, a grant to the requested waiver would foster the goals of the Universal Service program and serve the public interest. A grant of the waiver would permit NPI, a designated ETC serving very rural areas within the State of Michigan, to receive support for a quarter in which it has provided service eligible for support to subscribers. The Commission has repeatedly recognized that designation of competitive

ETCs promotes competition and benefits consumers in rural and high-cost areas.¹⁰

Denying NPI support to which it would be entitled, but for its misunderstanding of the quarterly line count filing requirements, is not in the public interest and undermines the Universal Service program.

Finally, strict application of the rules in the instant context would be unduly burdensome. While NPI has provided reliable wireless service to subscribers in the rural areas of Michigan, it has done so in the face of significant financial difficulties. NPI has provided to the Commission copies of its audited financial statements for the periods ended December 31, 2001, December 31, 2002 and December 31, 2003¹¹ under confidential treatment. Those financial statements demonstrate that NPI has a liquidity problem evidenced by an extremely heavy debt load in relation to relatively limited revenues. A denial of the instant request would only exacerbate the financial circumstances that exist for this Very Small Business rural service provider.

¹⁰ *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*; Federal-State Joint Board on Universal Service, Memorandum Opinion and Order, CC Docket No. 96-45, 12 FCC Rcd 48 (2000); *Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*; Federal-State Joint Board on Universal Service, Memorandum Opinion and Order, CC Docket No. 96-45, FCC 01-283 (rel. October 5, 2001).

¹¹ See, Further Supplement to Petition for Extension of Time to Comply with the Assistance Capability Requirements of Section 103 of CALEA, filed February 12, 2004; Addition to Further Supplement to Petition for Extension of Time to Comply with the Assistance Capability Requirements of Section 103 of CALEA, filed March 26, 2004.

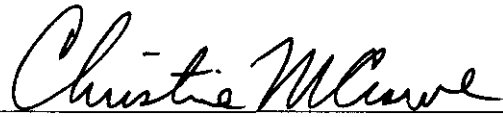
IV. CONCLUSION

For the reasons stated herein, NPI submits that granting a waiver of the filing deadlines set forth in Sections 54.307(c), 54.802(a) and 54.903 of the rules to allow NPI to receive universal service support for the first quarter of 2004 is appropriate, consistent with the Commission's statutory goal of preserving and advancing universal service, and will advance the public interest.

Respectfully submitted,

NPI-OMNIPOINT WIRELESS, LLC

By:


Christine M. Crowe

PAUL, HASTINGS, JANOFSKY
& WALKER, LLP
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Tenth Floor
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Its Attorneys

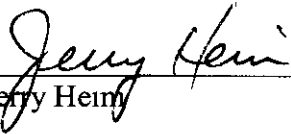
Dated: April 6, 2004

Declaration of Jerry Heim

I, Jerry Heim, do hereby declare under penalty of perjury that:

- 1 I am the Chief Financial Officer of NPI-Omnipoint Wireless, LLC.
2. I have read the foregoing "Petition of NPI-Omnipoint Wireless, LLC, for
3. Waiver of Deadlines in 47 C.F.R. §§ 54.307(c), 54.802(a) and 54.903
of the Commission's Rules."
4. I have personal knowledge of the facts set forth therein.
- 5 Except with respect to those facts of which judicial notice may be taken,
those facts are true and correct to the best of my knowledge, information,
and belief.

Executed this 5th day of April, 2004.



Jerry Heim

ATTACHMENT A

Atlanta
Beijing
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Stamford
Tokyo
Washington, D C

(202) 508-9562
christinecrowe@paulhastings.com

April 6, 2004

31515.00001

VIA FACSIMILE (866) 873-4666
AND VIA FEDERAL EXPRESS

Universal Service Administrative Company
444 Hoes Lane
Piscataway, NJ 08854

Re: NPI-Omnipoint Wireless, LLC
Submission of September, 2003 Quarterly Line Count Information for High
Cost, Interstate Access, and Interstate Common Line Support Funds

On behalf of NPI-Omnipoint Wireless, LLC ("NPI"), and subject to the waiver request being filed with the FCC simultaneously (as further described below), attached please find the following quarterly line count information:

- (1) High Cost Loop, Local Switching Support and Long Term Support Line Count information due as of September, 2003;
- (2) Interstate Access Support Line Count information due as of September, 2003; and
- (3) Interstate Common Line Support Mechanism Line Count information due as of September, 2003.

NPI is a commercial mobile radio service ("CMRS") provider that provides wireless service within the state of Michigan. NPI was designated by the Michigan Public Service Commission as an Eligible Telecommunications Carrier ("ETC") on August 26, 2003 with respect to its authorized service areas within the state. NPI timely submitted all of the initial self-certifications and line count information in order to receive Universal Service support. However, due to a misunderstanding of information that it had received from USAC, NPI did not file the line count information due in September, 2003. NPI is hereby submitting this line count information at this time, and is simultaneously submitting to the FCC a Petition for Waiver of those portions of the FCC's rules establishing deadlines for the submission of the attached line count information.

Paul Hastings

Universal Service Administrative Company
April 6, 2004
Page 2

Please do not hesitate to contact the undersigned should you have any questions in this regard.

Very truly yours,

A handwritten signature in black ink, reading "Christine M. Crowe". The signature is written in a cursive, flowing style with a large initial "C".

Christine M. Crowe
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

High Cost Loop, Local Switching Support and Long Term Support Line Count

Date: **September 30, 2003**

CETC Name **NPI-Omnipoint Wireless, LLC**

CETC Study Area Code (SAC): 319009

Contact Name: Jerry Heim

Contact Telephone Number. **231-883-5514**

Lines Reported As Of **March 31, 2003**

Areas are Eligible for Support/Ineligible for Support (select c) 319009

[illegible]

Interstate Access Support Line Count

Date **September 30, 2003**

CETC Name: **NPI-Omnipoint Wireless, LLC**

CETC Study Area Code (SAC): **319009**

Contact Name: **Jerry Heim**

Contact Telephone Number: **231-883-5514**

Lines Reported As Of: **June 30, 2003**

Areas are Eligible for Support/Ineligible for Support (select one): **New ETC Designation**

		Number of Lines								
		Zone 1		Zone 2		Zone 3		Zone 4		
Incumbent Carrier Name	Incumbent Carrier SAC	Residence and Single Line Business	Multi-Line Business	Residence and Single Line Business	Multi-Line Business	Residence and Single Line Business	Multi-Line Business	Residence and Single Line Business	Multi-Line Business	Total Line Count
Ace Telephone Company of Michigan, Inc.	310704	338 No UNE Zones								338
Ameritech Michigan	315090			1,059		18,897				19,956
Century Telephone of Michigan, Inc.	310702	2,386 No UNE Zones								2,386
Century Telephone of Michigan, Inc.	310671	221 No UNE Zones								221
CenturyTel of Upper Michigan, Inc.	310689	0 No UNE Zones								0
Chippewa County Telephone Company	310680	0 No UNE Zones								0

Hiawatha Telephone Company	310713	0 No UNE Zones				0
Island Telephone Co d/b/a TDS Telecom	310677	82 No UNE Zones				82
Kaleva Telephone Company	310703	21 No UNE Zones				21
Peninsula Telephone Company	310720	5 No UNE Zones				5
Pigeon Telephone Company	310721	115 No UNE Zones				115
Upper Peninsula Telephone Company	310732	0 No UNE Zones				0
Verizon North, Inc.	310695			9,694		9,694
The Winn Telephone Company	310737	0 No UNE Zones				0

FCC Form 507
Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310704	
2	Carrier Study Area Name	alpha characters	Ace Telephone Co. of Michigan	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number [including area code]	10 numeric digits	231 883-5514	

Block 2 - Line Counts

8	Residential and Single-Line Business Access Lines in Service	numeric digits	342	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	342	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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Expiration Date 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	315090	
2	Carrier Study Area Name	alpha characters	Amentech Michigan	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number (including area code)	10 numeric digits	231 883-5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	19894	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	19894	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3060-0972
Expiration Date: 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310677	
2	Carrier Study Area Name	alpha characters	Island Tel Co d/b/a TDS Telecom	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number (including area code)	10 numeric digits	231 883-5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	50	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	50	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO. OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310703	
2	Carrier Study Area Name	alpha characters	Kaleva Telephone Company	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number (including area code)	10 numeric digits	231 883 5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	26	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	26	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310720	
2	Carrier Study Area Name	alpha characters	Peninsula Telephone Company	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number [including area code]	10 numeric digits	231 883-5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	5	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	5	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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Expiration Date 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310721	
2	Carrier Study Area Name	alpha characters	Pigeon Telephone Company	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number (including area code)	10 numeric digits	231 883-5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	85	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	85	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Line Count Report

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Expiration Date 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310695	
2	Carrier Study Area Name	alpha characters	Verizon North, Inc	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number [including area code]	10 numeric digits	231 883 5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	10371	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	10371	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Interstate Common Line Support Mechanism
Line Count Report

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Expiration Date 9/30/2002

LINE COUNT DATA COLLECTION FOR PATH 1 CARRIERS				
Block 1 - Contact Information				
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE	NO OF ACQUIRED LINES
1	Carrier Study Area Code	6 numeric digits	310737	
2	Carrier Study Area Name	alpha characters	The Winn Telephone Company	
3	Service Provider Identification Number	9 numeric digits		
4	Data As Of	mm/dd/yyyy	3/31/2003	
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 1	Path 1	
6	Contact Name	alpha characters	Jerry Heim	
7	Contact Telephone Number [including area code]	10 numeric digits	231 883-5514	
Block 2 - Line Counts				
8	Residential and Single-Line Business Access Lines in Service	numeric digits	36	
9	Multi-Line Business Access Lines in Service	numeric digits	0	
10	Total Number of Access Lines in Service in Study Area	numeric digits	36	
11	Name of Carrier From Which Lines Were Acquired, If Applicable	alpha characters		
12	Study Area Code From Which Lines Were Acquired, If Applicable	6 numeric digits		

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Interstate Common Line Support Mechanism
Line Count Report

FCC Form 507
OMB Control No. 3045-0172
Expiration Date 01/01/12

LINE COUNT DATA COLLECTION FOR PATH 2 AND PATH 3 CARRIERS

Block 1 - Contact Information

ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE
1	Carrier Study Area Code	6 numeric digits	310702
2	Carrier Study Area Name	alpha characters	CenturyTel of Michigan, Inc
3	Service Provider Identification Number	9 numeric digits	36312003
4	Data As Of	mm/dd/yyyy	Identify Path 2 or Path 3
5	Disaggregation Path Selected by Incumbent Carrier	alpha characters	Jerry Heim
6	Contact Name	9 numeric digits	231 883-5514
7	Contact Telephone Number (include area code)	numeric digit(s)	2
8	Sheet number	numeric digit(s)	3
9	Total Number of Sheets	numeric digit(s)	

Block 2 - Line Counts for Each Disaggregation Zone
(Complete One Line for Each Zone)

Column 1 Disaggregation Zone Name	Column 2 Residential and Single Line Business Access Lines in Service	Column 3 Multi-Line Business Access Lines in Service	Column 4 Total Number of Access Lines in Service	Column 5 Acquired Residential and Single-Line Business Access Lines in Service	Column 6 Acquired Multi-Line Business Access Lines in Service	Column 7 Acquired Total Number of Access Lines in Service	Column 8 Name of Carrier From Which Lines Were Acquired	Column 9 Study Area Code From Which Lines Were Acquired
Zone 1	1476		1476					
Zone 2	837		837					
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								

Block 3 - Acquired Lines Not Included in a Previously Submitted Line Count Report

FCC FORM 507
Interstate Common Line Support Mechanism
Line Count Report

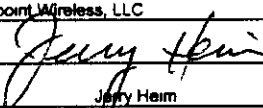
FCC Form 507
OMB Control No. 3060-0972
Expiration Date 9/10/2002

LINE COUNT DATA COLLECTION FOR PATH 2 AND PATH 3 CARRIERS									
Block 1 - Contact Information									
ROW #	DATA ELEMENT	FORMAT OF REQUESTED DATA	RESPONSE						
1	Carrier Study Area Code	6 numeric digits	310671						
2	Carrier Study Area Name	alpha characters	CenturyTel of Midwest Michigan, Inc.						
3	Service Provider Identification Number	9 numeric digits							
4	Data As Of	mm/dd/yyyy	3/31/2003						
5	Disaggregation Path Selected by Incumbent Carrier	Identify Path 2 or Path 3	Path 3						
6	Contact Name	alpha characters	Jerry Heim						
7	Contact Telephone Number (include area code)	9 numeric digits	231 883-5514						
8	Sheet number	numeric digit(s)	3						
9	Total Number of Sheets	numeric digit(s)	3						
Block 2 - Line Counts for Each Disaggregation Zone (Complete One Line for Each Zone)					Block 3 - Acquired Lines Not Included in a Previously Submitted Line Count Report				
	Column 1 Disaggregation Zone Name	Column 2 Residential and Single-Line Business Access Lines in Service	Column 3 Multi-Line Business Access Lines in Service	Column 4 Total Number of Access Lines in Service	Column 5 Acquired Residential and Single-Line Business Access Lines in Service	Column 6 Acquired Multi- Line Business Access Lines in Service	Column 7 Acquired Total Number of Access Lines in Service	Column 8 Name of Carrier From Which Lines Were Acquired	Column 9 Study Area Code From Which Lines Were Acquired
10	Zone 1	100		100					
11	Zone 2	132		132					
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									

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Interstate Common Line Support Mechanism
Line Count Report

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 507 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 507, Line Count Report for Interstate Common Line Support Mechanism, on Behalf of Reporting Carrier			
I certify that I am an officer or employee of the reporting carrier, my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 507; and, to the best of my knowledge, the information reported on this form is accurate			
Name of Reporting Carrier NPI-Omnipoint Wireless, LLC			
Signature of authorized officer or employee 			Date December 29, 2003
Printed name of authorized officer or employee Jerry Heim			
Title or position of authorized officer or employee Vice President of Finance			
Telephone number of authorized officer or employee (231) 883 - 5514			
Study Area Code of Reporting Carrier	New ETC Designation	Filing Due Date for this form 12/31/2003	
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001</small>			